

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

William Scales

Write the full name of each plaintiff or petitioner.

Case No. 21 CV 8142

-against-

Hotel trades council

Write the full name of each defendant or respondent.

NOTICE OF MOTION

dispositive, subpoena request of documents,
Trial request, and representation.

PLEASE TAKE NOTICE that

Plaintiff

William Scales

plaintiff or defendant

name of party who is making the motion

requests that the Court:

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.


In support of this motion, I submit the following documents (check all that apply):

- ☐ a memorandum of law
- ☒ my own declaration, affirmation, or affidavit
- ☐ the following additional documents:

2/1/22

Dated

William Scales



Signature

Name

820 Thieriot ave apartment 6h

Prison Identification # (if incarcerated)

Bronx

NY

10473

Address

347-781-6199

City

scales@live.com

State

Zip Code

Telephone Number (if available)

E-mail Address (if available)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

William Scales

Fill in above the full name of each plaintiff or petitioner.

Case No. 21 CV 8142

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Hotel Trades Council

Fill in above the full name of each defendant or
respondent.

DECLARATION

Briefly explain above the purpose of the declaration, for example, "in Opposition to Defendant's Motion for Summary Judgment."

I, William Scales, declare under penalty of perjury that the

following facts are true and correct:

In the space below, describe any facts that are relevant to the motion or that respond to a court order. You may also refer to and attach any relevant documents.

I need to request the subpoena of records in order to be allowed to show cause.
mr saltzman has provided false information to the courts pertaining to my
401k that is verified by all parties involved. I was not contacted by my employer
or hotel trades council and that fact is also proven with documents and testimony
provided by hotel trades council on numerous occasions.

the union arbitration led to the discovery of false documents provided by ace hotel. The union was never in possession of prior. These documents are false documents and have not been thoroughly investigated. I can prove the union has deliberately neglected their duties of representing me on numerous occasions. This also includes months of no reply until a judge order for the defendants default was served on a 2nd occasion that granted them additional response time, which led to the request of this case being transfered to Federal court. Hotel Trades Council has neglected this issue for years prior to being served and I can prove that if allowed by this court. I have reason to believe the union's true intention of the arbitration was to cause further delays and possible sabotage of this court process. I was not aware that attending the arbitration process on my own good faith of a possible disposition was an end all situation. As stated on numerous occasions Ive had no intention of closing this case regardless if Hotel trades Council Arbitration was not successful for them, unless it led to ace hotel fulfilling all missing contributions. Ive stated this when on a conference with the Honorable Judge cronan as well as in writing. I was under the full understanding that I was having "2 smoking guns" by attending the arbitration, as stated by the unions representation. This is why I must request for an attorney because the court had not clarified my participation into a possible sabotage effort would result into a final decision, which the court is given full jurisdiction and authority to ace hotel's false and missing documents and the impartial chair persons knowingly lack of investigation. I must request the documents in order to provide cause, a fair trial that has not been provided, and time to atleast

Attach additional pages and documents if necessary.

Executed on (date)
William Scales


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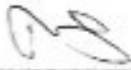
E-mail Address (if available)

seek a pro bono attorney. Im unemployed currently and cannot afford an attorney.IBU
 I must sincerely urge the court to grant me an opportunity to speak with a provided
 attorney in order to make my case that a trial is jus and fair. The resources used
 would only be 1 consultation if that attorney cannot make a motion for trial with my
 provided evidence. Additionaly during the arbitration process when speaking with
 union representation he informed me that the union was considering offering me
 \$74,000 in which I declined but informed him that I would review any offers along with
 the documents from the arbitration that was never mailed to me. After the arbitration
 process all talks ceased and ive never received any offers or the documents from the
 arbitration process. I need an order to supoen a these documents that may show cause
 that a fair trial be provided. Thank you

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The Court denies these requests. As the Court noted in its February 2, 2022 order, *see* Dkt. 27, Mr. Scales has not persuaded the Court to reconsider its earlier order, *see* Dkt. 16, staying discovery. Mr. Scales has also failed to put forward any additional arguments to show the existence of a meritorious claim to warrant the Court reconsidering its orders denying the requests for the appointment of counsel. *See* Dkts. 21, 27.

The Clerk of the Court is respectfully directed to close the motion pending at Docket Number 28 and to mail a copy of this order to the *pro se* plaintiff.

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SO ORDERED.

Date: February 4, 2022

New York, New York



JOHN P. CRONAN

United States District Judge